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6 **UNITED STATES DISTRICT COURT**
7 **DISTRICT OF NEVADA**

8 AMY BUCHANAN,

CASE NO. 2:19-cv-00226-GMN-BNW

9 Plaintiff,

10 vs.

**STIPULATION AND ORDER TO EXTEND
TIME FOR PLAINTIFF TO RESPOND TO
DEFENDANT'S MOTION FOR
SUMMARY JUDGMENT**

11
12 WATKINS & LETOFSKY, LLP, a Nevada
13 Limited-Liability Partnership; DOES I-X; ROE
14 BUSINESS ENTITIES I-X,

(Second Request)

15 Defendants.
16

The parties, by and through their respective counsel, hereby stipulate to extend the time for Plaintiff to respond to the Defendant's Motion for Summary Judgment (ECF No. 67) from the current due date of Monday, January 8, 2024 through and including **Tuesday, January 16, 2024**.

This is the second request for an extension of this deadline. The parties provide the following information to the Court regarding the proposed extension of time:

1. Plaintiff's counsel has required significant time off since December 28, 2023 as family leave to assist in the care of his sister who had spine surgery on December 29, 2023 and has had significant and potentially life threatening complications that resulted a hospital stay from December 29,

1 2023 through the present and ongoing until she can be transferred to
2 another facility before being transitioned to home.

- 3 2. Plaintiff's counsel has spent many hours during the past ten days assisting
4 his sister in the hospital and providing support for her during this health
5 crisis. Plaintiff's counsel is his sister's only family support in Nevada.
6
7 3. As a result of this family leave and other pressing work matters, Plaintiff's
8 counsel has not had sufficient time to devote to the response to the
9 Defendant's Motion for Summary Judgment and will need another week to
10 complete it.
11
12 4. As January 15 is the Martin Luther King Holiday, the parties agree that
13 Plaintiff's Opposition will be due on or before Tuesday, January 16, 2024.

14 This stipulation to extend the deadline is made in good faith and not for purposes of
15 delay.

16 DATED January 8, 2023.

17 KEMP & KEMP, ATTORNEYS AT LAW

18 WATKINS & LETOFSKY, LLP

19 By: /s/ James P. Kemp

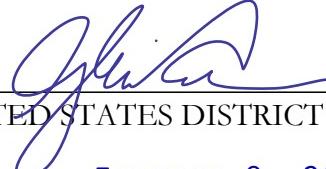
20 By: /s/ Daniel R. Watkins

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29 Henderson, NV 89074
30 *Attorneys for Defendants*

31 **ORDER**

32 IT IS SO ORDERED:

33 
34 _____
35 UNITED STATES DISTRICT JUDGE
36 _____
37 DATED: January 8, 2024